

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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CITY OF BIRMINGHAM RETIREMENT AND :  
RELIEF SYSTEM; ELECTRICAL WORKERS :  
PENSION FUND LOCAL 103, I.B.E.W.; and :  
LOCAL 103, I.B.E.W. HEALTH BENEFIT PLAN, : Civil Action No.: 1:19-cv-01704-JSR  
individually and on behalf of all others similarly :  
situated, :

Plaintiffs, :

v. :

BANK OF AMERICA, N.A.; BARCLAYS BANK :  
PLC; BARCLAYS CAPITAL INC.; BNP PARIBAS :  
SECURITIES CORP.; CITIGROUP GLOBAL :  
MARKETS INC.; CREDIT SUISSE AG; CREDIT :  
SUISSE SECURITIES (USA) LLC; DEUTSCHE :  
BANK AG; DEUTSCHE BANK SECURITIES INC.; :  
FIRST TENNESSEE BANK, N.A.; FTN :  
FINANCIAL SECURITIES CORP.; GOLDMAN :  
SACHS & CO. LLC; JPMORGAN CHASE BANK, :  
N.A.; JPMORGAN SECURITIES LLC; MERRILL :  
LYNCH, PIERCE, FENNER & SMITH INC; AND :  
UBS SECURITIES LLC, :

Defendants. :

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ALASKA ELECTRICAL PENSION FUND, :  
on behalf of itself and all others similarly situated, :

Plaintiff, :

v. :

BANK OF AMERICA, N.A., MERRILL LYNCH, :  
PIERCE, FENNER & SMITH INC., BARCLAYS :  
CAPITAL INC., BNP PARIBAS SECURITIES :  
CORP., CITIGROUP GLOBAL MARKETS INC., :  
DEUTSCHE BANK SECURITIES INC., HSBC :  
SECURITIES (USA) INC., HSBC BANK PLC, J.P. :  
MORGAN CHASE BANK, N.A.; J.P. MORGAN :  
SECURITIES LLC, J.P. MORGAN CHASE BANK, :  
N.A., NOMURA SECURITIES INTERNATIONAL, :

Civil Action No.: 1:19-cv-01796-JSR

INC., TD SECURITIES (USA) LLC, and WELLS  
FARGO SECURITIES, LLC,

Defendants.

-----X  
DEERFIELD BEACH MUNICIPAL  
FIREFIGHTERS' PENSION TRUST FUND,  
individually and on behalf of all others similarly  
situated,

Plaintiff,

v.

BANK OF AMERICA, N.A.; BARCLAYS BANK  
PLC; BARCLAYS CAPITAL INC.; BNP PARIBAS  
SECURITIES CORP.; CITIGROUP GLOBAL  
MARKETS INC.; CREDIT SUISSE AG; CREDIT  
SUISSE SECURITIES (USA) LLC; DEUTSCHE  
BANK AG; DEUTSCHE BANK SECURITIES INC.;  
FIRST TENNESSEE BANK, N.A.; FTN  
FINANCIAL SECURITIES CORP.; GOLDMAN  
SACHS & CO. LLC; JPMORGAN CHASE BANK,  
N.A.; JPMORGAN SECURITIES LLC; MERRILL  
LYNCH, PIERCE, FENNER & SMITH INC; AND  
UBS SECURITIES LLC,

Defendants.

-----X  
LINCOLNSHIRE POLICE PENSION FUND,  
individually and on behalf of all others similarly  
situated,

Plaintiff,

v.

BANK OF AMERICA, N.A.; BARCLAYS BANK  
PLC; BARCLAYS CAPITAL INC.; BNP PARIBAS  
SECURITIES CORP.; CITIGROUP GLOBAL  
MARKETS INC.; CREDIT SUISSE AG; CREDIT  
SUISSE SECURITIES (USA) LLC; DEUTSCHE  
BANK AG; DEUTSCHE BANK SECURITIES INC.;  
FIRST TENNESSEE BANK, N.A.; FTN

Civil Action No.: 1:19-cv-1900-JSR

Civil Action No.: 1:19-cv-2045-JSR

FINANCIAL SECURITIES CORP.; GOLDMAN  
SACHS & CO. LLC; JPMORGAN CHASE BANK,  
N.A.; JPMORGAN SECURITIES LLC; MERRILL  
LYNCH, PIERCE, FENNER & SMITH INC.; AND  
UBS SECURITIES LLC,  
  
Defendants.  
  
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JOSEPH M. TORSELLA, IN HIS OFFICIAL  
CAPACITY AS TREASURER OF THE  
COMMONWEALTH OF PENNSYLVANIA,  
individually and on behalf of all others similarly  
situated,

Plaintiff,

- against -

BANK OF AMERICA, N.A.; BARCLAYS BANK  
PLC; BARCLAYS CAPITAL INC.; BNP PARIBAS  
SECURITIES CORP.; CITIGROUP GLOBAL  
MARKETS INC.; CREDIT SUISSE AG; CREDIT  
SUISSE SECURITIES (USA) LLC; DEUTSCHE  
BANK AG; DEUTSCHE BANK SECURITIES INC.;  
FIRST TENNESSEE BANK, N.A.; FTN  
FINANCIAL SECURITIES CORP.; GOLDMAN  
SACHS & CO. LLC; JPMORGAN CHASE BANK,  
N.A.; J.P. MORGAN SECURITIES LLC; MERRILL  
LYNCH, PIERCE, FENNER & SMITH INC.; AND  
UBS SECURITIES LLC,

Defendants.  
  
-----X

Civil Action No.: 1:19-cv-02438-JSR

**STIPULATION AND [PROPOSED] ORDER REGARDING SERVICE AND  
TIME FOR DEFENDANTS TO ANSWER, MOVE OR OTHERWISE  
RESPOND TO THE COMPLAINTS**

WHEREAS, on February 22, 2019, plaintiffs City of Birmingham Retirement and  
Relief System, Electrical Workers Pension Fund Local 103, I.B.E.W, and Local 103, I.B.E.W.

Health Benefit Plan (“City of Birmingham”) filed a complaint in Case No. 1:19-cv-01704 in this Court (“City of Birmingham action”);

WHEREAS, on February 26, 2019, plaintiff Alaska Electrical Pension Fund (“Alaska Electrical”) filed a complaint in Case No. 1:19-cv-01796 in this Court (“Alaska Electrical action”) and marked the action as related to the City of Birmingham action;

WHEREAS, on February 28, 2019, plaintiff Deerfield Beach Municipal Firefighters’ Pension Trust Fund (“Deerfield Beach”) filed a complaint in Case No. 1:19-cv-01900 in this Court (“Deerfield Beach action”) and marked the action as related to the City of Birmingham action;

WHEREAS, on March 5, 2019, plaintiff Lincolnshire Police Pension Fund (“Lincolnshire Police” and, together with City of Birmingham, Alaska Electrical, and Deerfield Beach, “Plaintiffs”) filed a complaint in Case No. 1:19-cv-2045 in this Court (“Lincolnshire Police action”) and marked the action as related to the City of Birmingham action;

WHEREAS, on March 19, 2019, plaintiff Joseph M. Torsella, in his Official Capacity as Treasurer of the Commonwealth of Pennsylvania (“Torsella” and, together with City of Birmingham, Alaska Electrical, Deerfield Beach, and Lincolnshire Police, “Plaintiffs”) filed a complaint in Case No. 1:19-cv-02438 in this Court (“Torsella action”) and marked the action as related to the City of Birmingham action;

WHEREAS, the City of Birmingham action, the Alaska Pension Fund action, the Deerfield Beach action, the Lincolnshire Police action, and the Torsella action are collectively referred to herein as the “Related Actions”;

WHEREAS, the following parties (“Defendants”) are named as defendants in one or more of the Related Actions: Bank of America, N.A., Barclays Bank PLC, Barclays Capital

Inc., BNP Paribas Securities Corp., Citigroup Global Markets Inc., Credit Suisse AG, Credit Suisse (USA) LLC, Deutsche Bank AG, Deutsche Bank Securities Inc., HSBC Securities (USA) Inc., HSBC Bank PLC, First Tennessee Bank, N.A., FTN Financial Securities Corp., Goldman Sachs & Co. LLC, JPMorgan Chase Bank, J.P. Morgan Securities LLC, Merrill Lynch, Pierce, Fenner & Smith Inc., Nomura Securities International, Inc., TD Securities (USA) LLC, UBS Securities LLC, and Wells Fargo Securities, LLC;

WHEREAS, certain Plaintiffs in the Related Actions have attempted to effectuate service of their complaint on certain Defendants, but not others;

WHEREAS, the Related Actions involve common questions of law and fact, make substantially similar factual allegations and assert the same claims, and the undersigned parties agree, subject to approval of the Court, that the Related Actions should be consolidated for all purposes under Federal Rule of Civil Procedure 42(a);

WHEREAS, on March 18, 2019, the Court scheduled an initial conference on April 3, 2019 at 11:00 AM for the purpose of case management pursuant to Fed. R. Civ. P. 16, and ordered the parties to submit a proposed case management plan by March 27, 2019;

WHEREAS, there has been no prior request to extend any deadlines in the Related Actions;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to approval of the Court, that:

1. The undersigned counsel accept service of the complaints in the Related Actions on behalf of their respective clients, expressly reserving the right to contest whether any party is properly named as a defendant, and without waiver of any defenses, including without limitation

those related to personal jurisdiction and venue, except as to the sufficiency of process and the service of process.

2. All Defendants' time to answer, move or otherwise respond to the complaints filed in the Related Actions is hereby suspended until an order is entered by the Court at or after the April 3 initial conference at which the parties anticipate addressing with the Court, among other things, a schedule for: (i) the consolidation of the Related Actions; (ii) the appointment of interim lead counsel under Federal Rule of Civil Procedure 23(g); (iii) the filing of the Consolidated Amended Complaint; and (iv) a briefing schedule for motions to dismiss the Consolidated Amended Complaint.

Dated: March 21, 2019  
New York, New York

Respectfully submitted,



Christopher M. Burke  
SCOTT+SCOTT ATTORNEYS AT LAW LLP  
600 W. Broadway  
Suite 3300  
San Diego, CA 92101  
Telephone: (619) 233-4565  
Facsimile: (619) 233-0508  
cburke@scott-scott.com

David R. Scott  
Amanda F. Lawrence  
SCOTT+SCOTT ATTORNEYS AT LAW LLP  
156 South Main Street  
P.O. Box 192  
Colchester, CT 06415  
Telephone: (860) 537-5537  
Facsimile: (860) 537-4432  
david.scott@scott-scott.com  
alawrence@scott-scott.com

Donald A. Broggi  
Kristen Anderson  
Thomas Boardman  
SCOTT + SCOTT ATTORNEYS AT LAW LLP  
The Helmsley Building  
230 Park Avenue, 17th Floor  
New York, NY 10169  
Telephone: (212) 223-6444  
Facsimile: (212) 223-6334  
dbroggi@scott-scott.com  
kanderson@scott-scott.com  
tboardman@scott-scott.com

Vincent Briganti  
Christian Levis  
Roland R. St. Louis, III  
LOWEY DANNENBERG, P.C.  
44 South Broadway  
Suite 1100  
White Plains, NY 10601  
Telephone: (914) 997-0500  
Facsimile: (914) 997-0035  
vbriganti@lowey.com  
clevis@lowey.com  
rstlouis@lowey.com

Julia R. McGrath  
LOWEY DANNENBERG, P.C.  
One Tower Bridge  
100 Front Street  
Suite 520  
West Conshohocken, PA 19405  
Telephone: (215) 399-4770  
Facsimile: (610) 862-9777  
jmcgrath@lowey.com



George A. Zelcs  
Randall P. Ewing, Jr.  
Ryan Z. Cortazar  
KOREIN TILLERY, LLC  
205 North Michigan Avenue  
Suite 1950  
Chicago, IL 60601  
Telephone: (312) 61-9750  
Facsimile: (312) 641-9751  
gzels@koreintillery.com  
rewing@koreintillery.com  
rcortazar@koreintillery.com


Stephen M. Tillery  
Michael E. Klenov  
KOREIN TILLERY, LLC  
505 North 7th Street  
Suite 3600  
St. Louis, MO 63101  
Telephone: (314) 241-4844  
Facsimile: (314) 241-3525  
stillery@koreintillery.com  
mklenov@koreintillery.com

Todd A. Seaver  
Carl N. Hammarskjold  
BERMAN TABACCO  
44 Montgomery Street  
Suite 650  
San Francisco, CA 94104  
Telephone: (415) 433-3200  
Facsimile: (415) 433-6382  
tseaver@bermantabacco.com  
chammariskjold@bermantabacco.com



Leslie R. Stern  
BERMAN TABACCO  
One Liberty Square  
Boston, MA 02109  
Telephone: (617) 542-8300  
Facsimile: (617) 542-1194  
lstern@bermantabacco.com

*Attorneys for Plaintiffs City of Birmingham  
Retirement and Relief System and Electrical  
Workers Pension Fund Local 103, I.B.E.W. and  
Local 103, I.B.E.W. Health Benefit Plan*



Daniel L. Brockett  
Steig D. Olson  
Thomas J. Lepri  
Christopher M. Seek  
QUINN EMMANUEL URQUHANT &  
SULLIVAN, LLP  
51 Madison Avenue, 22nd Floor  
New York, NY 10010  
Telephone: (212) 849-7000  
Facsimile: (212) 849-7100  
danbrockett@quinnemmauel.com  
steigolson@quinnemmauel.com  
thomaslepri@quinnemmauel.com  
christopherseck@quinnemmauel.com

Anthony P. Alden  
Jeremy D. Andersen  
QUINN EMMANUEL URQUHANT &  
SULLIVAN, LLP  
865 South Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
Telephone: (213) 443-3000  
Facsimile: (213) 443-3100  
anthonyalden@quinnemmauel.com  
jeremyandersen@quinnemmauel.com

---

Patrick J. Coughlin  
David W. Mitchell  
Brian O. O'Mara  
Steven M. Jodlowski  
Ashley M. Kelly  
ROBBINS GELLER RUDMAN & DOWD LLP  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: (619) 231-1058  
Facsimile: (619) 231-7423  
patc@rgrdlaw.com  
bomara@rdrdlaw.com  
sjodlowski@rgrdlaw.com  
akelly@rgrdlaw.com

*Attorneys for Plaintiff Alaska Electrical Pension  
Fund*

---

Daniel L. Brockett  
Steig D. Olson  
Thomas J. Lepri  
Christopher M. Seek  
QUINN EMMANUEL URQUHANT &  
SULLIVAN, LLP  
51 Madison Avenue, 22nd Floor  
New York, NY 10010  
Telephone: (212) 849-7000  
Facsimile: (212) 849-7100  
danbrockett@quinnemmauel.com  
steigolson@quinnemmauel.com  
thomaslepri@quinnemmauel.com  
christopherseck@quinnemmauel.com

Anthony P. Alden  
Jeremy D. Andersen  
QUINN EMMANUEL URQUHANT &  
SULLIVAN, LLP  
865 South Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
Telephone: (213) 443-3000  
Facsimile: (213) 443-3100  
anthonyalden@quinnemmauel.com  
jeremyandersen@quinnemmauel.com



---

Patrick J. Coughlin  
David W. Mitchell  
Brian O. O'Mara  
Steven M. Jodlowski  
Ashley M. Kelly  
ROBBINS GELLER RUDMAN & DOWD LLP  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: (619) 231-1058  
Facsimile: (619) 231-7423  
patc@rgrdlaw.com  
bomara@rdrdlaw.com  
sjodlowski@rgrdlaw.com  
akelly@rgrdlaw.com

*Attorneys for Plaintiff Alaska Electrical Pension  
Fund*

Linda Nussbaum / DS

Linda P. Nussbaum  
Bart D. Cohen  
Fred T. Isquith  
NUSSBAUM LAW GROUP, P.C.  
1211 Avenue of the Americas, 40th Floor  
New York, NY 10036  
Telephone: (917) 438-9189  
lnussbaum@nussbaumpc.com  
bcohen@nussbaumpc.com  
fisquith@nussbaumpc.com

Jayne A. Goldstein  
SHEPHERD FINKELMAN  
MILLER & SHAH LLP  
1625 N. Commerce Parkway  
Suite 320  
Fort Lauderdale, FL 33326  
Telephone: (954) 515-0123  
jgoldstein@sfmslaw.com

***Attorneys for Plaintiffs Deerfield Beach  
Municipal Firefighters' Pension Trust Fund and  
Lincolnshire Police Pension Fund***

Michael J. Freed  
Robert J. Wozniak  
Brian M. Hogan  
FREED KANER LONDON & MILLEN LLC  
2201 Waukegan Road  
Suite 130  
Bannockburn, IL 60015  
Telephone: (224) 632-4500  
Facsimile: (224) 632-4500

***Attorneys for Plaintiff Lincolnshire Police  
Pension Fund***

Jonathan B. Pitt / JS

Jonathan B. Pitt  
WILLIAMS & CONNOLLY LLP  
650 Fifth Avenue, Suite 1500  
New York, New York 10019  
Telephone: (646) 949-2800  
Facsimile: (646) 949-2801

725 Twelfth Street, NW  
Washington, DC 20005  
Telephone: (202) 434-5341  
Facsimile: (202) 434-5029  
jpitt@wc.com

*Attorney for Defendants Bank of America, N.A.  
and Merrill Lynch, Pierce, Fenner & Smith LLC*

Richard D. Owens / JS

Richard D. Owens  
Lawrence E. Buterman  
LATHAM & WATKINS LLP  
885 Third Avenue  
New York, New York 10022-4834  
Telephone: (212) 906-1200  
Facsimile: (212) 751-4864  
richard.owens@lw.com  
lawrence.buterman@lw.com

*Attorneys for Defendants Barclays Bank PLC and  
Barclays Capital Inc.*





Adam S. Hakki  
Agnès Dunogué  
SHEARMAN & STERLING LLP  
599 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 848-4000  
Facsimile: (212) 848-7179  
adam.hakki@shearman.com  
agnes.dunogue@shearman.com

*Attorneys for Defendant BNP Paribas Securities Corp.*



Meredith Kotler  
CLEARY GOTTlieb STEEN & HAMILTON  
LLP  
One Liberty Plaza  
New York, New York 10006  
Telephone: (212) 225-2000  
mkotler@cgsh.com

*Attorney for Defendant Citigroup Global Markets Inc.*

David G. Januszewski / JS

David G. Januszewski  
Herbert S. Washer  
Jonathan D. Their  
Peter J. Linken  
CAHILL GORDON & REINDEL LLP  
80 Pine Street  
New York, New York 10005  
Telephone: (212) 701-3000  
djanuszewski@cahill.com  
hwascher@cahill.com  
jthier@cahill.com  
plinken@cahill.com

*Attorneys for Defendants Credit Suisse AG and  
Credit Suisse (USA) LLC*

John Terzaken / JS

John Terzaken  
Abram J. Ellis  
Jonathan D. Porter  
Adrienne V. Baxley  
SIMPSON THACHER & BARTLETT LLP  
900 G Street, NW  
Washington, DC 20001  
Telephone: (202) 636-5858  
Facsimile: (202) 636-5502  
john.terzaken@stblaw.com

*Attorneys for Defendants Deutsche Bank AG and  
Deutsche Bank Securities Inc.*



Daniel L. Stein /DS

Daniel L. Stein  
MAYER BROWN LLP  
1221 Avenue of the Americas  
New York, NY 10020-1001  
Telephone: (212) 506-2500  
Facsimile: (212) 262-1910  
dstein@mayerbrown.com

Andrew S. Marovitz (*pro hac vice* forthcoming)  
Britt M. Miller (*pro hac vice* forthcoming)  
MAYER BROWN LLP  
71 South Wacker Drive  
Chicago, Illinois 60606  
Telephone: (312) 782-0600  
Facsimile: (312) 701-7711  
amarovitz@mayerbrown.com  
bmiller@mayerbrown.com

***Attorneys for Defendants HSBC Securities (USA)  
Inc. and HSBC Bank PLC***

Robert D. Wick /DS

Robert D. Wick (appearing *pro hac vice*)  
Henry Liu  
Jeff Cao  
COVINGTON & BURLING LLP  
One City Center  
8500 Tenth Street, N.W.  
Washington D.C. 20001  
Telephone: (202) 662-6000  
rwick@cov.com  
hliu@cov.com  
jcao@cov.com

***Attorneys for Defendants First Tennessee Bank,  
N.A. and FTN Financial Securities Corp.***

Richard C. Pepperman II / JS

Richard C. Pepperman II  
Matthew J. Porpora  
SULLIVAN & CROMWELL LLP  
125 Broad Street  
New York, New York 10004-2498  
Telephone: (212) 558-4000  
Facsimile: (212) 558-3588  
peppermanr@sullcrom.com  
porporam@sullcrom.com  
carterjo@sullcrom.com

*Attorneys for Defendant Goldman Sachs & Co.  
LLC*

Boris Bershteyn / JS

Boris Bershteyn  
SKADDEN, ARP, SLATE,  
MEAGHER & FLOM LLP  
Four Times Square  
New York, NY 10036  
Telephone: (212) 735-3000  
Facsimile: (212) 735-2000  
boris.bershteyn@skadden.com

Gretchen M. Wolf (*pro hac vice* forthcoming)  
Lara A. Flath (*pro hac vice* forthcoming)  
SKADDEN, ARP, SLATE,  
MEAGHER & FLOM LLP  
155 N. Wacker Drive  
Chicago, IL 60606  
Telephone: (312) 407-0700  
Facsimile: (312) 407-0411  
gretchen.wolf@skadden.com  
lara.flath@skadden.com

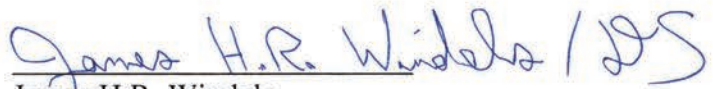
*Attorneys for Defendants JPMorgan Chase Bank,  
N.A. and J.P. Morgan Securities LLC*

 / JS

Brian J. Fischer  
JENNER & BLOCK LLP  
919 Third Avenue  
New York, New York 10022-3908  
Telephone: (212) 891-1629  
Facsimile: (212) 891-1699  
bfischer@jenner.com

Matthew S. Hellman  
JENNER & BLOCK LLP  
1099 New York Avenue, NW, Suite 900  
Washington, D.C. 20001-4412  
Telephone: (202) 639-6861  
Facsimile: (202) 661-4983  
mhellman@jenner.com

*Attorneys for Defendant Nomura Securities  
International, Inc.*

 / JS

James H.R. Windels  
Brian M. Burnovski  
DAVIS POLK & WARDWELL LLP  
450 Lexington Avenue  
New York, New York 10017  
Telephone: (212) 450-4000  
Facsimile: (212) 701-5800  
james.windels@davispolk.com  
brian.burnovski@davispolk.com

*Attorneys for Defendant TD Securities (USA) LLC*

 / JS

Jefferson E. Bell  
GIBSON DUNN  
200 Park Avenue  
New York, NY 10166-0193  
Telephone: (212) 351-4000  
Facsimile: (212) 351-4035  
jbell@gibsondunn.com

D. Jarrett Arp  
GIBSON DUNN  
1050 Connecticut Avenue, N.W.  
Washington, DC 20036-5306  
Telephone: (202) 955-8500  
Facsimile: (202) 467-0539  
jarp@gibsondunn.com

*Attorneys for Defendant UBS Securities LLC*

 / JS

Jonathan Rosenberg  
O'MELVENY & MYERS LLP  
7 Times Square  
New York, NY 10036  
Telephone: (212) 326-2000  
Facsimile: (212) 326-2061  
jrosenberg@omm.com

Ian Simmons  
Katrina Robson  
O'MELVENY & MYERS LLP  
1625 Eye Street, NW  
Washington, DC 20006  
Telephone: (202) 383-5300  
Facsimile: (202) 383-5414  
isimmons@omm.com  
krobson@omm.com

*Attorneys for Defendant Wells Fargo Securities,  
LLC*

**SO ORDERED.**

Dated: New York, New York  
March \_\_, 2019

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Hon. Jed S. Rakoff